United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	ID0000175	170517	C	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Hecla Ltd.
Lucky Friday Mine and Mill
397 Friday Avenue
Mullan, ID 83846

Entry Time/Date	Permit Effective Date
08:00am 5/17/2017	09/14/2003
Exit Time/Date	**Permit Expiration Date**
1:30pm 5/17/2017	08/01/2008, admin extnd

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Lance Boylan - Environmental Engineer (208) 744-1833

Tim Kilbreath - Health, Safety and Environmental Manager (208) 744-1869

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

NAICS #212222 Silver Ore Mining

Lat/Long: 47.470600 -115.778508

Major

Permit Modification 08/01/2008, now admin extnd

Name, Address of Responsible Official/Title/Phone and Fax Number

Clayr Alexander, VP & General Manger
Hecla Ltd., Lucky Friday Mine and Mill
P.O. Box 31, Mullan, Idaho 83846
(208) 744-1751, ext. 2304

Contacted: ☐ Yes ☑ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	✓ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	✓ Laboratory	☐ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	EPA/R10/OCE/MIRE 206 553-5068	05/18/2017
June Bergquist	IDEQ (208) 666-4605	
Craig Borrenpohl	IDEQ (208) 666-4604	
Signature of Management Q A Reviewer: Kimberly A. Ogle	Agency/Office/Phone and Fax Numbers: EPA/OCE/MIRE 30955	Date: 12/3/18

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIs
5-23-17

INSTRUCTIONS

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G	Pretreatment (Audit)
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J	Complaints
M	Multimedia
N	Spill
O	Compliance Evaluation (Oversight)
P	Pretreatment Compliance Inspection
R	Reconnaissance
S	Compliance Sampling
U	IU Inspection with Pretreatment Audit
X	Toxics Inspection
Z	Sludge - Biosolids
#	Combined Sewer Overflow-Sampling
$	Combined Sewer Overflow-Non-Sampling
+	Sanitary Sewer Overflow-Sampling
&	Sanitary Sewer Overflow-Non-Sampling
\	CAFO-Sampling
=	CAFO-Non-Sampling
2	IU Sampling Inspection
3	IU Non-Sampling Inspection
4	IU Toxics Inspection
5	IU Sampling Inspection with Pretreatment
6	IU Non-Sampling Inspection with Pretreatment
7	IU Toxics with Pretreatment
!	Pretreatment Compliance (Oversight)
@	Follow-up (enforcement)
{	Storm Water-Construction-Sampling
}	Storm Water-Construction-Non-Sampling
:	Storm Water-Non-Construction-Sampling
~	Storm Water-Non-Construction-Non-Sampling
<	Storm Water-MS4-Sampling
-	Storm Water-MS4-Non-Sampling
>	Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)
B ----	EPA (Contractor)
E —	Corps of Engineers
J —	Joint EPA/State Inspectors—EPA Lead
L ----	Local Health Department (State)
N —	NEIC Inspectors
O—	Other Inspectors, Federal/EPA (Specify in Remarks columns)
P—	Other Inspectors, State (Specify in Remarks columns)
R —	EPA Regional Inspector
S —	State Inspector
T —	Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

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Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

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This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

United States Environmental Protection Agency
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Lucky Friday Mine and Mill
397 Friday Avenue
Mullan, ID 83846

Entry Time/Date	Permit Effective Date
08:00am 5/17/2017	06/04/2015
Exit Time/Date	**Permit Expiration Date**
1:30pm 5/17/2017	06/04/2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Lance Boylan - Environmental Engineer (208) 744-1833

Tim Kilbreath - Health, Safety and Environmental Manager (208) 744-1869

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

NAICS #212222 Silver Ore Mining

Lat/Long: 47.470600 -115.778508

MSGP, Sector G - Metal Mining
Previously covered under 2008 MSGP
IDR05C290

Name, Address of Responsible Official/Title/Phone and Fax Number

Clayr Alexander, VP & General Manger
Hecla Ltd., Lucky Friday Mine and Mill
P.O. Box 31, Mullan, Idaho 83846
(208) 744-1751, ext. 2304

Contacted ☐ Yes ☑ No

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● ● ● ● ● ● ● ● ● ● _____

● ● ● ● ● ● ● ● ● ● _____

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Jon Klemesrud	EPA/R10/OCE/MIRE 206 553-5068	05/18/2017
June Bergquist	IDEQ (208) 666-4605	
Craig Borrenpohl	IDEQ (208) 666-4604	
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National Pollutant Discharge Elimination System (NPDES) Inspection Report

Hecla Ltd.
Lucky Friday Mine and Mill

NPDES Individual Discharge Permit: ID0000175

Multi-Sector General Permit for Stormwater Discharges from Industrial Facilities (MSGP) NPDES Tracking Number: IDR053139

Prepared by:

Jon Klemesrud
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multi-Media Inspection and RCRA Enforcement Unit

Table of Contents

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Lance Boylan or from observations made during the inspection.]

I. Facility Information

Facility Name:	Hecla Mining Company / Lucky Friday Mine and Mill
Facility Contacts:	Lance Boylan – Environmental Engineer (208) 744-1833 lboylan@hecla-mining.com Tim Kilbreath – Health, Safety & Environmental Manager (208) 744-1869 tkilbreath@hecla-mining.com Clayr Alexander, VP and General Manager (208) 744-1751 ext. 2304 (not present during the inspection)
Facility Location:	397 Friday Avenue Mullan, Idaho 83846
GPS:	N 47.470600 W -115.778508
Mailing Address:	Hecla Mining Company / Lucky Friday Mine and Mill P.O. Box 31 Mullan, Idaho 83846
NPDES Permit No: MSGP Tracking No:	ID0000175 IDR053139

II. Inspection Information

Inspection Date:	May 17, 2017
Inspectors:	Jon Klemesrud, Inspector EPA Region 10, OCE / MIRE (206) 553-5068 Craig Borrenpohl, Water Quality Engineer Idaho Department of Environmental Quality (208) 666-4604 June Bergquist Idaho Department of Environmental Quality (208) 666-4605

Arrival Time:	08:00 AM
Departure Time:	01:30 PM
Weather Condition:	Light Rain
Receiving waters:	South Fork of the Coeur d'Alene River, Little North Fork of the Coeur d' Alene River, Harris Creek.

Purpose: Document compliance status with the facility's NPDES Individual Permit and Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP).

III. Inspection Chronology

Due to the complexity of the environmental management systems in place as well as an ongoing labor strike at Lucky Friday Mine and Mill (Lucky Friday), this was an announced inspection. I called Lucky Friday's Lance Boylan two days prior to the inspection to check his availability. Mr. Boylan has taken over a majority of the environmental duties since Lucky Friday's previous Environmental Manager (Bradley Kucera) left the company in 2016. Mr. Boylan and I agreed on the inspection date/time and discussed logistics to the site. I also informed Mr. Boylan that I would be joined by two staff members with Idaho Department of Environmental Quality (IDEQ) for shadowing purposes only.

The day of the inspection I arrived at the Lucky Friday security/visitor check-in with IDEQ representatives Craig Borrenpohl and June Bergquist. We then followed Mr. Boylan to the environmental office trailer to begin the inspection. At this time, I identified myself as an EPA inspector, presented my inspector credentials and provided Mr. Boylan with my business card. Mr. Borrenpohl and Mrs. Berguist introduced themselves as well. I informed Mr. Boylan that the purpose of the visit was to conduct a compliance inspection under the facility's individual permit as well as for Lucky Friday's coverage under the 2015 MSGP.

The EPA inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection. The inspection included a facility drive/walk-through and a records review. The records review was followed by a closing conference with Mr. Boylan and Health, Safety & Environmental Manager Tim Kilbreath.

IV. Background

Lucky Friday is an underground silver, lead, zinc mine located one mile east of Mullan Idaho. The mine complex includes the mine, processing mill, four tailings ponds (TP1, TP2, TP3 and TP4), two wastewater treatment facilities (WWTP2 and WWTP3) and three NPDES individually permitted outfalls (001, 002, 003). The facility is operating under an administratively extended individual permit ID0000175 (effective September

14, 2003, last modified August 1, 2008). Lucky Friday also has permit coverage for stormwater discharges under EPA's 2015 MSGP (tracking number IDR053139). Lucky Friday was last inspected by EPA in May of 2015.

Over the past 5 years Lucky Friday has stopped production on a few occasions, the Mine Safety and Health Administration (MSHA) imposed a shutdown from early 2012 until mid-2014. At the time of this inspection, Lucky Friday was involved in a labor strike with the local union and was not in production. The labor strike began in March 2017.

In 2015 Lucky Friday completed a multi-year hydrogeologic investigation at Tailing Pond 3 (TP3) in response to a 2013 Request for Information from EPA. According to the December 2015 Hydrogeologic Investigation Report, no primary Idaho groundwater quality standards were exceeded during the investigation. In 2015 Lucky Friday entered into a Voluntary Consent Order with Idaho Department of Environmental Quality to implement the closure plan for TP3.

The most recent EPA enforcement action was in June of 2015, EPA and Hecla Mining reached a $600,000 settlement agreement for Clean Water Act violations that occurred between 2009 and 2014.

V. Individual Permit ID0000175 Inspection Findings

Lucky Friday has discharge authorization for three outfalls under ID0000175, only Outfalls 002 and 003 have actively discharged in recent years. Outfall 001 is located along the South Fork of the Coeur d'Alene River below tailings pond 1 (TP1). TP1 last discharged in 2008 via Outfall 001 and is now permanently closed. The piping system that conveyed any discharges to Outfall 001 from TP1 have been removed. TP1 has been reclaimed and the surface has been stabilized for many years now.

Tailings Pond 2 (TP2) last discharged in 2009 and has since been permanently closed and reclaimed as of 2013. Roughly half of the reclaimed pond is vegetated; the other half is currently being used for material storage. The previous inspection report had mentioned a potential land swap with Idaho Transportation Department (ITD) that would deed 7 acres of the reclaimed pond to ITD. At the time of the inspection Mr. Boyland stated that the land swap did not occur.

Tailings Pond 3 (TP3) hasn't received tailings since 2010 and Lucky Friday has initiated steps for a closure plan for TP3 with IDEQ. Routine inputs to TP3 consist primarily of wastewater treatment residuals as well as water collected from the lower bench on the southeast tow of the embankment. As mentioned above, in 2015 Lucky Friday completed a multi-year hydrogeologic investigation at Tailing Pond 3 (TP3) in response to a 2013 Request for Information from EPA.

Tailings Pond 4 (TP4) is the only pond that receives tailings when operating, and due to the inactive status of the mine at the time of inspection it last received tailings in March of 2017.

Wastewater collected from the Pond 4 underdrain and toe drain combine with a decant line and is routed to WWTP3 as is discharged out of Outfall 003 to the South Fork of the Coeur d'Alene River.

Outfall 002 discharges treated wastewater from WWTP2 to the South Fork of the Coeur d'Alene River, also the natural drainage at Outfall 002 also serves as a discharge and sampling location for stormwater runoff (Stormwater Outfall 1).

Samples for effluent monitoring are collected using an ISCO 6712 composite sampler with flow-proportioned control from a ISCO 4230 flow meter. The facility utilizes two labs for analytical that is required by the permit Nautulis Lab is used for WET testing and Silver Valley Lab Analytical, Inc. (SVL) conducts the metals and E. coli. Brooks Rand Labs conducts their low-level mercury.

At the time of the inspection the facility was testing a new disc filter (HSF2200 series) at Outfall 003 that was installed in January 2017, with future plans for a secondary filter and thickening tank.

VI. MSGP IDR053139 Inspection Findings

Lucky Friday renewed their stormwater coverage in 2015 and discharges are covered under the current MSGP, they had previously been covered under the 2008 MSGP (IDR05C290).

As part of the inspection we toured stormwater catchment areas as well as the eight potential stormwater outfalls that have been identified by the facility. Lucky Friday has implemented multiple BMP's to prevent stormwater runoff from potential problem areas. The facility has installed several concrete collection basins downgradient of the mine/mill areas with strategic grading and berms to limit and contain stormwater runoff. Water from these concrete basins either infiltrate or are pumped to water treatment. Liquids and soluble materials are stored indoors and most storage areas are covered and/or enclosed.

Stormwater Outfall 1 which covers the surrounding areas around Lucky Friday's remediated Tailings Pond 2 (TP2) was the only outfall discharging at the time of inspection. According to the facility, Outfall 1 is typically the only outfall that will occasionally discharge, most often stormwater is infiltrated at this location. The area is primarily used for light, temporary material storage, including plastics, metals and wood. Due to the occasional metals storage, Lucky Friday utilizes a Storm Clean® catch-basin insert by CleanWay equipped with MetalZorb metals removal media as well as silt fencing and waddles for BMP's.

The facility follows a monthly schedule for conducting routine facility inspections, the monthly and the quarterly visual inspections are primarily conducted by Senior Environmental Technician Judy Cloos.

VII. Records Review

The file review included the following records:

- **NPDES Permit** – At the time of the inspection Mr. Boylan provided me with the current copy of their Individual Permit as well as the 2015 MSGP.

- **Quality Assurance Plan** – At the time of the inspection I conducted a partial review of the Quality Assurance Plan that was dated December 2003. The document was last revised in May 2011.

- **Best Management Practices Plan** – At the time of the inspection I conducted a partial review of the Best Management Practices Plan, it was last dated September of 2016 and is reviewed annually.

- **Discharge Monitoring Reports (DMRs)** – I reviewed the last 5 years of monthly DMRs prior to the inspection. This was completed as part of a report generated by EPA's ICIS database. The review showed no exceedances post the 2015 EPA enforcement action. The report did however show non-receipt data for Zinc parameters applicable to Outfall 003 in November of 2016, it was determined that this was an error within a NetDMR submittal and the matter has been resolved with EPA.

  Monitoring Records – At the time of the inspection I reviewed random months of monitoring records which included sampling data, bench sheets and analytical records.

- **Stormwater Pollution Prevention Plan (SWPPP)** – At the time of inspection I conducted a partial review of the facilities SWPPP to compare against permit requirements, the SWPPP was signed November 6, 2015.

- **MSGP Quarterly Visual Assessments and Routine Inspection Reports**– At the time of inspection I reviewed the Quarterly Visual Assessments and Routine Inspection Reports going back to 2015, this also included the 2015 and 2016 Comprehensive Site Inspection Report.

VIII. Areas of Concern

Observations during the inspection did not identify any areas of concern.

IX. Closing Conference

A closing conference was held with Mr. Boylan and Mr. Kilbreath to discuss our inspection observations. I then thanked them for their time and cooperation with the inspection.

Report Completion Date: 11/27/18

Lead Inspector Signature:

ATTACHMENT A

Photograph Documentation

All photographs taken by Jon Klemesrud on May 17, 2017
Nikon Coolpix AW100, Serial # 32197190

Photograph Log – Lucky Friday Mine and Mill

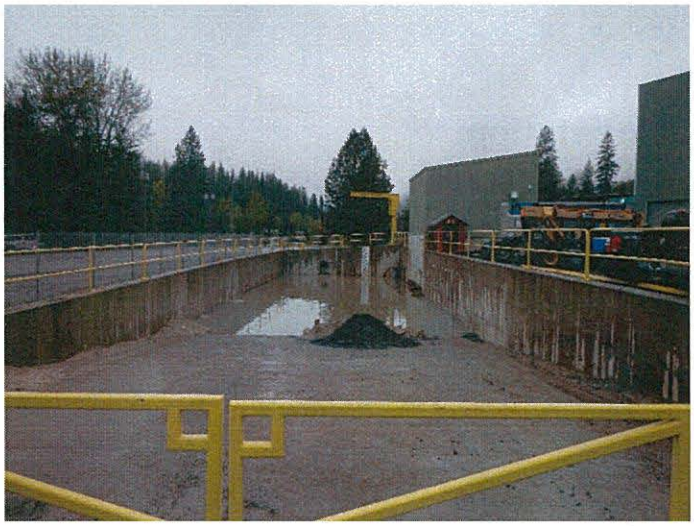

Photo #:01
Description: Photo taken of one of the stormwater controls used the facility. A concrete stormwater basin that receives stormwater from the mine/mill area.

Photo #:02
Description: Photo taken of a stormwater catch basin that receives runoff from a material storage area. Water is routed to a concrete stormwater basin.

Photo #:03
Description: Photo taken of another concrete storage basin that receives stormwater from the mine/mill area.

Photo #:04
Description: Photo taken of reclaimed Pond 1.

Photograph Log – Lucky Friday Mine and Mill

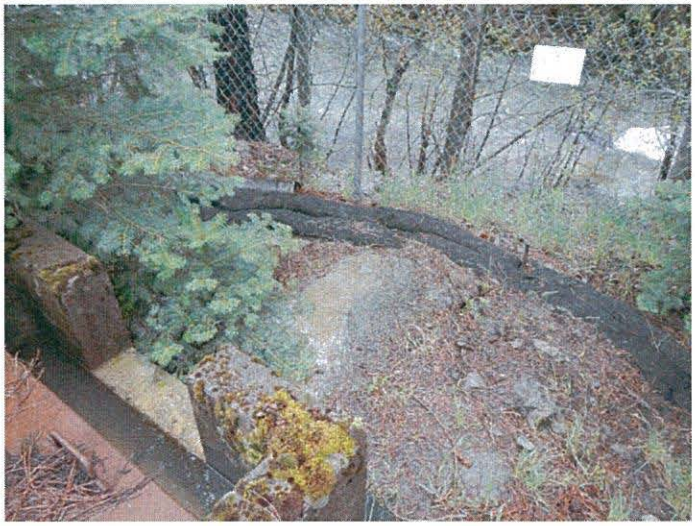

Photo #:05
Description: Photo taken of stormwater Outfall 1, discharging at the time of inspection to the South Fork of the Coeur d'Alene River near NPDES Outfall 002.

Photo #:06
Description: Photo of the catch basin that serves stormwater Outfall 1.

Photo #:07
Description: Photo of the catch basin that serves stormwater Outfall 1.

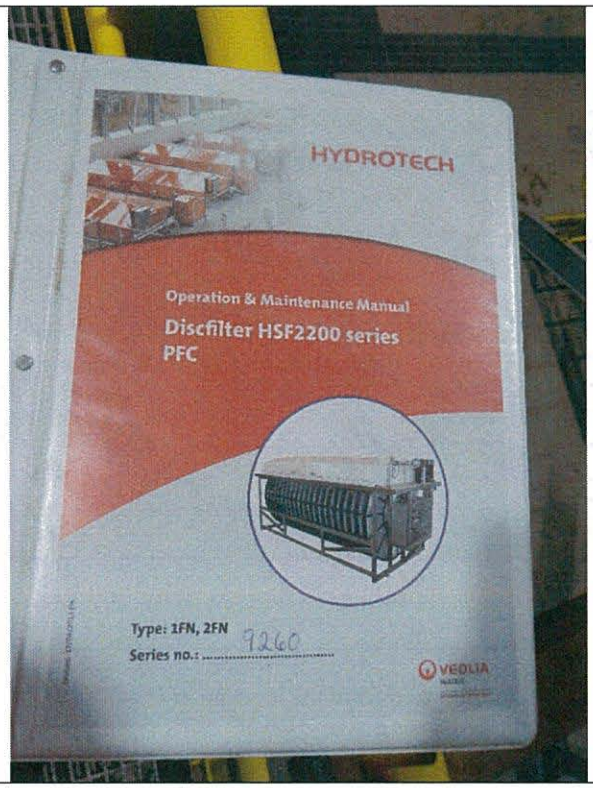

Photo #:08
Description: Photo of the O&M Manual for the new disc filter at WWTP3.

Photograph Log – Lucky Friday Mine and Mill

Photo #:9
Description: Photo taken from inside WWTP3.

Photo #:10
Description: Photo taken of new disc filter location at WWTP3.

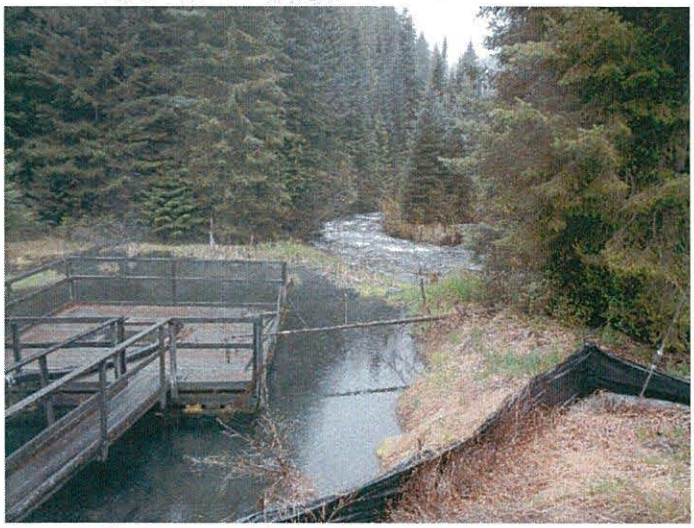

Photo #:11
Description: Photo taken from the location of Outfall 003 to the South Fork of the Coeur d'Alene River

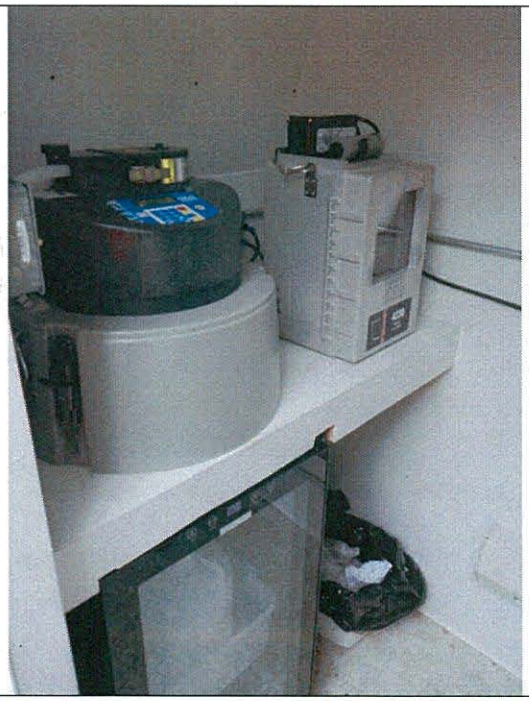

Photo #:12
Description: Photo taken of refrigerated ISCO sampler that serves Outfall 003.

Photograph Log – Lucky Friday Mine and Mill

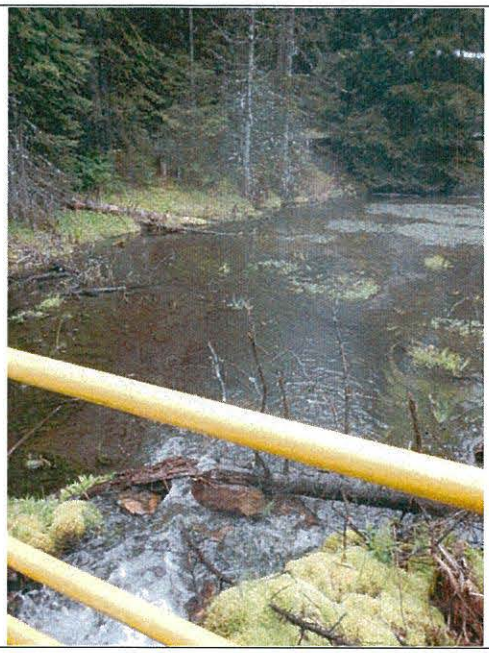

Photo #:13
Description: Photo taken from the location of Outfall 003, discharging at the time of inspection.

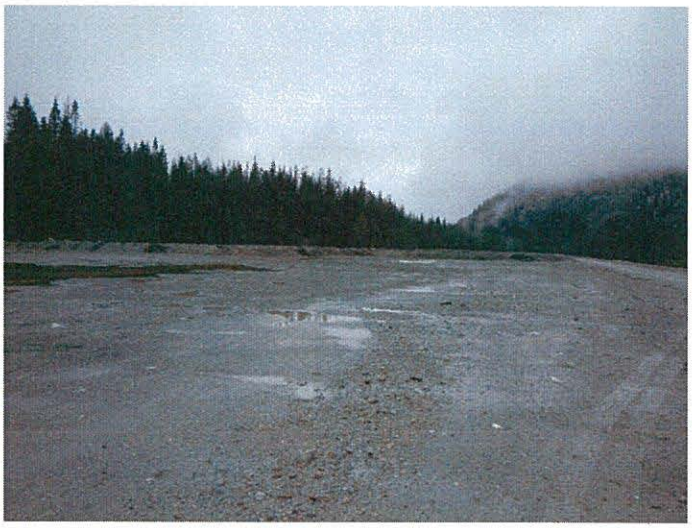

Photo #:14
Description: Photo taken from TP3, facility has submitted draft closure plans to IDEQ.

Photo #:15
Description: Photo taken of the southeast bench of TP3. Location of the recent hydrogeologic study.

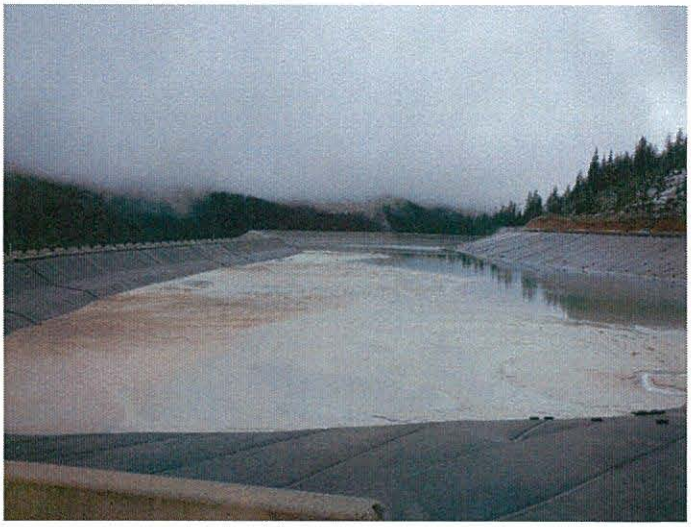

Photo #:16
Description: Photo of TP4 at the time of inspection.